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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

# **IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION**

**THIS DOCUMENT RELATES TO:**

*Epic Games, Inc. v. Google LLC et al.,*  
Case No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.,*  
Case No. 3:21-cv-05227-JD

*Match Group, LLC et al. v. Google LLC et al.*,  
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF LAUREN  
A. MOSKOWITZ IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED PURSUANT TO  
CIVIL LOCAL RULE 79-5**

Date: January 31, 2023 at 1:30 p.m.

Courtroom: 11, 19<sup>th</sup> Floor

Judge: Hon. James Donato

1 I, Lauren A. Moskowitz, declare as follows:

2 1. I am a Partner at Cravath, Swaine & Moore LLP, counsel to Epic Games, Inc. (“Epic”)  
 3 in the above-captioned actions. I am admitted to appear before this Court *pro hac vice*.

4 2. I have personal, first-hand knowledge of the facts set forth in this Declaration. If called  
 5 as a witness, I could and would competently testify to these facts under oath.

6 3. Plaintiffs’ Response to Google’s Brief in Response to the Court’s Minute Order  
 7 Questions Regarding Preservation of Chat Messages (“Plaintiffs’ Response”) and exhibits to the  
 8 Declaration of Michael J. Zaken (“Zaken Declaration”) contain portions that are sourced from  
 9 materials that Defendants Google LLC, Google Ireland Limited, Google Commerce Limited, Google  
 10 Asia Pacific Pte. Limited, and Google Payment Corp. (collectively, “Google”), have designated as  
 11 “CONFIDENTIAL” and “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to  
 12 the operative Protective Orders entered by the Court, Case No. 3:21-md-02981-JD, ECF Nos. 247,  
 13 248, and 249. The following table shows the portions of Plaintiffs’ Response and the exhibits to the  
 14 Zaken Declaration that contain information designated as “CONFIDENTIAL” and “HIGHLY  
 15 CONFIDENTIAL – ATTORNEYS’ EYES ONLY”.

Document	Corresponding Page and Line Number(s)	Designating Party
Plaintiffs’ Response	Page 9, lines 17-19, between “among other things,” and “(GOOG-PLAY3-000012530.)”	Google
Plaintiffs’ Response	Page 9, footnote 7, between “Jim Kolotouros testified that” and “(Zaken Decl.”	Google
Plaintiffs’ Response	Page 12, line 7, between “whether” and “was going”	Google
Plaintiffs’ Response	Page 12, lines 8-9, between “long made efforts to” and “(Zaken Decl.”	Google
Plaintiffs’ Response	Page 12, line 9, between “likely that these” and “discussions contained”	Google
Plaintiffs’ Response	Page 12, line 10, between “competitors like” and “Ms. Kochikar”	Google
Plaintiffs’ Response	Page 12, lines 11-13, between “on, emailed” and “(Zaken Decl.”	Google

Document	Corresponding Page and Line Number(s)	Designating Party
Plaintiffs' Response	Page 12, line 14-15, between "As another example" and "(Zaken Decl.)"	Google
Zaken Decl. Ex. 6	Document in its entirety.	Google
Zaken Decl. Ex. 7	Document in its entirety.	Google
Zaken Decl. Ex. 8	Document in its entirety.	Google
Zaken Decl. Ex. 9	Document in its entirety.	Google
Zaken Decl. Ex. 10	Document in its entirety.	Google
Zaken Decl. Ex. 11	Document in its entirety.	Google

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct and that I executed this declaration on January 27, 2023 in Short Hills, NJ.

3 */s/ Lauren A. Moskowitz*  
4 Lauren A. Moskowitz

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